



TOWN OF NORWELL CONSERVATION COMMISSION

P.O. Box 295 345 Main Street
Norwell, MA 02061-0295
(781) 659 - 8022

Kathleen Baskin, P.E.
Director of Water Policy
Executive Office of Energy & Environmental Affairs
100 Cambridge Street, 9th floor
Boston, MA 02114
Email: kathleen.baskin@state.ma.us

Re: SWMI Framework Comments

Dear Ms. Baskin:

The Norwell Conservation Commission is writing in response to the Sustainable Water Management Initiative (SWMI) "Framework" proposal of February 3, 2012. The Commission is charged with not only implementing the Wetland Protection Act Regulations but the Norwell Wetland Bylaw as well. In addition, we preserve, protect and manage 8 public lands with trails that meander through woodland and along brooks. The majority of Norwell also contains water supply protection zones. The landscape is beautiful and treasured by all Norwell Residents. Excessive water withdrawals alter protected resources by changing groundwater levels and hydrology, which then in turn further drains surface water bodies, altering irreparably, habitat, and other protected and treasured natural resources and features.

I appreciate the tremendous effort that state staff and others have dedicated to the SWMI process. The scientific findings and development of ecologically-based stream flow criteria represent a major step forward. However, the weaknesses in the proposed Framework undermine its effectiveness and would make it impossible to achieve truly sustainable water management. These deficiencies must be addressed.

The goal of sustainable water management should be to use water wisely, so that our rivers, streams and wetlands have enough clean water to support healthy populations of native fish. Protecting rivers that are healthy, and restoring those that are not, should be explicit goals of SWMI.

Currently, 292 sub-basins in Massachusetts – more than 20% – are seriously degraded by water withdrawals, and another 227 are losing fish and could fall into the degraded category if they were subjected to increased withdrawals. Yet the SWMI Framework proposes safe yield withdrawal limits that are several times higher than the latest science indicates is safe for fish; exempts some permitted withdrawals from having to fully minimize and mitigate the impacts of their withdrawal; and allows "non-essential" water use when flows are below safe levels. This is not sustainable water management.

Please take note, that right now, as you decide the fate of the Rivers and Waterways of the Commonwealth the current weather changes have resulted in the following reported conditions as noted in the Boston Globe.

- Eighteen of the state's rivers (according to the US Geological Survey) were at record-low levels for the end of March, 34 were lower than 90 percent of all previous measurements, and six were lower than 75 percent of previous measurements, some of which date back nearly a century. Only two of 60 locations were at normal levels.
- If a drought advisory is issued, this would be the third such advisory in the past decade. A spokeswoman for the state Department of Conservation and Recreation said the unseasonably low river levels "could pose some real challenges for both water supply and habitat protection." Some environmental advocates said less oxygen in rivers and streams and increased temperatures because of low water flows could devastate the annual runs of herring, alewife, and other fish species that make their way from the ocean to breed in the fresh water of many rivers in the state.

Withdrawals based on your proposal combined with current low flow conditions will result in potentially catastrophic depletion and irreparable damage to our rivers and water bodies. Nothing in the SWMI proposal will prevent vulnerable rivers, streams and wetlands from being pumped dry, which is unacceptable. We can and must do better. We must seize this once-in-a-generation opportunity to begin a process of gradual restoration of degraded rivers, streams and wetlands. We should start by establishing protective safe yield withdrawal limits consistent with the latest research.

Thank you for the opportunity to comment.

Sincerely,



Nancy Hemingway
Norwell Conservation Commission Agent

Cc: Commissioner Kenneth Kimmell, MassDEP (Kenneth.Kimmell@state.ma.us)
Commissioner Mary Griffin, MassDFG (Mary.Griffin@state.ma.us)
Commissioner Edward Lambert, MassDCR (Edward.Lambert@state.ma.us)
Assistant Secretary Phillip Griffiths, EOEEA (Phillip.Griffiths@state.ma.us)